## Holland & Knight

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March 19, 2025

## VIA ECF

Hon. Jennifer E. Willis United States Magistrate Judge, S.D.N.Y. Thurgood Marshall United States Courthouse 40 Foley Square, Room 425 New York, New York 10007

Re: YAD ITERAM BRALINE, LLC v. Klugmann,

Case No. 1:25-cv-00467 (VSB) (JEW)

Dear Magistrate Judge Willis:

We are counsel for plaintiff YAD ITERAM BRALINE, LLC ("Plaintiff") in the above-referenced action. Pursuant to that certain Order of Reference, dated February 12, 2025 (ECF No. 10, the "Order of Reference"), the Honorable Vernon S. Broderick, U.S.D.J., referred this matter to Your Honor for the purpose of, *inter alia*, general pre-trial and proper next steps following the removal of Plaintiff's Motion for Summary Judgment in Lieu of a Complaint pursuant to Section 3211 of New York Civil Practice Law and Rules (the "State-Court Pleadings") to this Court. *See* ECF Nos. 7, 9.

Accordingly, we respectfully request that the Court set a briefing schedule and/or schedule a case management conference for proceeding with Plaintiff's motion for summary judgment under Rule 56 of the Federal Rules of Civil Procedure ("FRCP") and Your Honor's Individual Rules and Practices so that this action may proceed.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ John M. Doherty
John M. Doherty, Esq.

CC: All Counsel of Record